

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TENNESSEE**

In re: DENNIS WAYNE KING
Debtor.

Case No. 19-23840-D
Chapter 13

MOTION TO AMEND PLAN AND REDUCE PAYMENT

Comes now the debtor, by and through counsel of record, and for this Motion states:

1. The debtor filed for relief under Chapter 13 of the United States Bankruptcy Code on May 15, 2019.
2. The debtor listed Check Into Cash as a secured creditor in his original petition, holding a purchase-money security interest in the debtor's 2007 Toyota Camry automobile. Said vehicle was recently totaled and the debtor's insurance will pay the claim.
3. The debtor proposes to modify this plan to delete Check Into Cash from his plan for their secured claim, any deficiency balance will be transferred to general unsecured. Any Court-imposed insurance on said vehicle should be canceled.
4. The Trustee would adjust the debtor's plan payment accordingly.

WHEREFORE, the debtor moves the Court to reduce his overall plan payments accordingly.

Respectfully Submitted,

/s/ Herbert D. Hurst
Herbert D. Hurst 18721
Hurst Law Firm, P. A.
Attorney for Debtor(s)
P. O. Box 41497
Memphis, TN 38174-1497
(901) 725-1000

CERTIFICATE OF SERVICE

The undersigned party, attorney for party, or agent therefore, hereby certifies that on this 31st day of July, 2019, copies of the above document were electronically mailed, mailed via the United States Postal Service, or hand delivered to the parties listed.

/s/ Joshua Kirk

Joshua Kirk, Legal Assistant
Hurst Law Firm, P. A.
Attorney for Debtor(s)
P. O. Box 41497
Memphis, TN 38174-1497
(901) 725-1000

NAMES AND ADDRESSES OF ENTITIES SERVED:

Debtor
Chapter 13 Trustee

Check Into Cash
4041 Elvis Presley Blvd.
Memphis, TN 38116

Check Into Cash
ATTN: Collections
PO Box 550
Cleveland, TN 37364